

Date: 01/03/2005

To: FCC Localism Task Force

From: J. Zach Schiller, Ph.D. Candidate, Sociology, University of California, Davis

RE: Reply to Comments filed for MB Docket No. 04-233

Madame and Sir Commissioners,

I write in response to Comments by some in this Proceeding who argue that LPFM applicants not be given preference over FM translator applicants. Many individuals, as well as groups such as the Educational Media Foundation, appear to have a valid concern that their viewpoints are underrepresented and need protection. However, in their comments filed to the FCC on Docket No. 04-233, the Educational Media Foundation alone admits to as many as 160 existing translators, hardly the plight of an underrepresented group.

Further, they suggest that any merit of LPFM be questioned because such stations “may be nothing more than over-the-air-jukeboxes, which would not offer the kinds of informational programming currently provided by translators operated by EMF and other noncommercial broadcasters.” On the basis of what might be, these filers argue for preferential treatment and point to their own demonstrated success at providing informational programming. It seems much more reasonable to actually take a long look at the actually existing LPFM stations to note what they are actually doing, rather than assuming they “may be nothing more than over-the-air-jukeboxes.”

In my dissertation research, I examine in depth the case of LPFM KRBS in Oroville, CA. There, quality news and public affairs combine with locally produced programs ranging from music of nearly all varieties to public-service programs for the area’s sizeable Hmong population who speak very little English. A vibrant community of civic-minded individuals has been forged around this new station, broadcasting since 2002. No single perspective or group is privileged over others in an attempt to reflect the diversity and creativity of Butte County, California. These and other findings from my dissertation research have not yet been published, but I would be happy to keep the Commission informed when they are. In the meantime I would also be happy to share further insights and comments, at the Commission’s convenience, on the value that LPFM can bring to local communities. I feel strongly that LPFM represents a salient example of a strengthening of localism in broadcasting, and every effort must be made to secure, protect, and expand such access in many more communities across the country.

In hundreds of other LPFM stations across the country, church groups (both conservative and moderate), civic organizations, and community associations have found significant voice in their local public affairs through the presence of an LPFM in their town. Such voice would never have been found without the LPFM service, and certainly would not have been given expression on a translator for an out-of-state broadcaster. EMF’s argument that some slice of some demographic somewhere may be kept out of the public airwaves runs directly against the evidence that LPFM stations often actively welcome

such underrepresented groups. Why should an out-of-town broadcaster, via a translator, be given preference over a local group applying for an LPFM who may well include the very local voices EMF is concerned about?

I strongly advocate that the FCC Localism Task Force find a solution that can satisfy LPFM and FM noncommercial translator interests such as EMF. In cases where an established local organization is applying for an LPFM license, evidence suggests that such groups will in fact incorporate a diversity of voices from its communities, very possibly including those constituencies that EMF is concerned about. A Localism Task Force should prioritize locally established organizations applying for LPFM licenses over out-of-town translator applicants who merely wish to pipe in syndicated programming. If I read the comments clearly, they, I, and many others concerned about our contemporary media are most concerned about the lack of localism in media. Why, then, would they be advocating for translators that would by definition further enhance syndicated program practices and further degrade localism?

Prioritizing FM noncommercial translators over locally-established organizations who wish to broadcast in the local public interest seems anathema to the reasons for which the Localism Task Force was created. I strongly suggest the Task Force follow the suggestions of the Prometheus Radio Project on this important matter. I quote one passage of their comments in particular which speaks directly to the issue at hand:

"We believe that translators should have a secondary status with regard to locally based Low Power stations if a bonafide local organization wants to use a channel for real, new, local broadcasting, they should not be pre-empted by a repeater. The licensing system as it stands gives preference to remote, out of state organizations looking to rebroadcast on thousands of channels nationwide, rather than to local entities who want just one community radio station."

I urge the Commission to expand the LPFM service and to give preference to local organizations seeking single, locally-relevant radio stations over out of state concerns seeking an expansion of their signal.

Thank you for your time and attention to this important matter,

J. Zach Schiller

Ph.D. Candidate, Sociology, University of California, Davis